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FILED

JUN 04 2020

Clerk, U.S. District Court
District Of Montana
Great Falls

**ATTORNEYS FOR PLAINTIFF
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

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| UNITED STATES OF AMERICA, | CR 20- 46-BLG- DLC |
| Plaintiff, | INDICTMENT |
| vs. | COERCION AND ENTICEMENT |
| BRANDON FRANK STRICKER, | Title 18 U.S.C. § 2422(b) (Counts I-IV) (Penalty: Mandatory minimum ten years to lifetime imprisonment, \$250,000 fine, five years to lifetime supervised release, \$5000 special assessment) |
| Defendant. | RECEIPT OF CHILD PORNOGRAPHY (Count V) Title 18 U.S.C. § 2252(a)(2) (Penalty: Mandatory minimum five years to 20 years imprisonment, \$250,000 fine, and five years to lifetime supervised release) |

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| | <p>ATTEMPTED SEX TRAFFICKING OF A MINOR (Count VI) Title 18 U.S.C. § 1591(a), (b), and (c) (Penalty: Mandatory minimum ten years to life imprisonment, \$250,000 fine, five years to lifetime supervised release, \$5000 special assessment)</p> <p>ANIMAL CRUSHING (Count VII) Title 18 U.S.C. § 48 (Penalty: Seven years imprisonment, \$250,000 fine, and three years supervised release)</p> <p>ATTEMPTED WITNESS TAMPERING (Count VIII) Title 18 U.S.C. § 1512(b)(3) (Penalty: 20 years imprisonment, \$250,000 fine, and three years supervised release)</p> |
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THE GRAND JURY CHARGES:

COUNT I

That beginning in or around June 2018, and continuing until in or around August 2018, at Billings, in Yellowstone County, in the State and District of Montana, and elsewhere, the defendant, BRANDON FRANK STRICKER, knowingly and unlawfully used a means of interstate commerce, including, but not limited to, the Internet, Facebook, and a cellular telephone, to persuade, induce, entice, and coerce an individual who he believed had not attained the age of 18 years, Jane Doe 1, to engage in sexual activity for which any person could be

charged with a criminal offense, specifically Sexual Intercourse without Consent, in violation of Mont. Code Ann. § 45-5-503, and Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a), all in violation of 18 U.S.C. § 2422(b).

COUNT II

That beginning in or before August 2018, and continuing until in or around April 2020, at Billings, in Yellowstone County, in the State and District of Montana, and elsewhere, the defendant, BRANDON FRANK STRICKER, knowingly and unlawfully used a means of interstate commerce, including, but not limited to, the Internet, Facebook, and a cellular telephone, to persuade, induce, entice, and coerce an individual who he believed had not attained the age of 18 years, Jane Doe 2, to engage in sexual activity for which any person could be charged with a criminal offense, specifically Sexual Intercourse without Consent, in violation of Mont. Code Ann. § 45-5-503, and Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a), all in violation of 18 U.S.C. § 2422(b).

COUNT III

That beginning in or before October 2018, and continuing until in or around April 2020, at Billings, in Yellowstone County, in the State and District of Montana, and elsewhere, the defendant, BRANDON FRANK STRICKER, knowingly and unlawfully used a means of interstate commerce, including, but not limited to, the Internet, Facebook, and a cellular telephone, to persuade, induce,

entice, and coerce an individual who he believed had not attained the age of 18 years, Jane Doe 3, to engage in sexual activity for which any person could be charged with a criminal offense, specifically Sexual Intercourse without Consent, in violation of Mont. Code Ann. § 45-5-503, and Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a), all in violation of 18 U.S.C. § 2422(b).

COUNT IV

That beginning in or around July 2019 and continuing until in or around March 2020, at Billings, in Yellowstone County, in the State and District of Montana, and elsewhere, the defendant, BRANDON FRANK STRICKER, knowingly and unlawfully used a means of interstate commerce, including, but not limited to, the Internet, Facebook, and a cellular telephone, to persuade, induce, entice, and coerce an individual who he believed had not attained the age of 18 years, Jane Doe 4, to engage in sexual activity for which any person could be charged with a criminal offense, specifically Sexual Intercourse without Consent, in violation of Mont. Code Ann. § 45-5-503, and Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a), all in violation of 18 U.S.C. § 2422(b).

COUNT V

That on or about August 11, 2018, at Billings, in the State and District of Montana, and elsewhere, the defendant, BRANDON FRANK STRICKER, knowingly received any visual depiction, that is video files, that had been shipped

in and affecting interstate and foreign commerce, by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct, in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT VI

That in or around October 2018 until in or around December 2018, at Billings, within Yellowstone County, in the State and District of Montana, and elsewhere, the defendant, BRANDON FRANK STRICKER, in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means an individual, Jane Doe 5, knowing and in reckless disregard of the fact that Jane Doe 5 was under the age of 18 years old and having had a reasonable opportunity to observe Jane Doe 5, attempted for Jane Doe 5 to engage in a commercial sex act, in violation of 18 U.S.C. §§ 1591(a), (b)(2), and (c), and 1594.

COUNT VII

That on or about August 23, 2019, at Billings, in the State and District of Montana, the defendant, BRANDON FRANK STRICKER, did knowingly create animal crush videos, as defined in Title 18 U.S.C. § 48(f), intending and having reason to know that the videos would be distributed in, and using a means and

facility of, interstate and foreign commerce, in violation of 18 U.S.C.

§ 48(b)(1)(A).

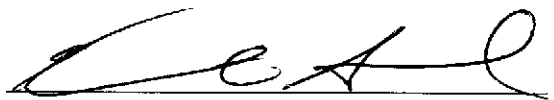
COUNT VIII

That on or about a period between April 15, 2020, and May 12, 2020, at Billings, in the State and District of Montana, the defendant, BRANDON FRANK STRICKER, knowingly attempted to corruptly persuade another person, with the intent to hinder, delay, and prevent the communication of information relating to the commission of a federal offense to a law enforcement officer, and committed a substantial step toward corruptly persuading that other person, in violation of 18 U.S.C. § 1512(b)(3).

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

FOREPERSON:



KURT. G. ALME
United States Attorney



JOSEPH E. THAGGARD
Criminal Chief Assistant U.S. Attorney

Crim. Summons _____
Warrant: ☒ _____
Bail: _____